

Robert W. Boatman (009619)
Paul L. Stoller (016773)
Shannon L. Clark (019708)
GALLAGHER & KENNEDY, P.A.
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Telephone: (602) 530-8000
rwb@gknet.com
paul.stoller@gknet.com
SLC@gknet.com

Ramon Rossi Lopez (CA Bar No. 86361)
(admitted *pro hac vice*)
LOPEZ McHUGH LLP
100 Bayview Circle, Suite 5600
Newport Beach, California 92660
rlopez@lopezmchugh.com
Co-Lead/Liaison Counsel for Plaintiffs

James R. Condo (#005867)
Amanda C. Sheridan (#027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2202
Telephone: (602) 382-6000
E-Mail: jcondo@swlaw.com
asheridan@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
Nelson Mullins Riley & Scarborough, LLP
201 17th St. NW, Suite 1700
Atlanta, GA 30363
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com
*Attorneys for Defendants C. R. Bard, Inc.
and Bard Peripheral Vascular, Inc.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In re Bard IVC Filters Products
Liability Litigation

NO. MD-15-02641-PHX-DGC

**THE PARTIES' STIPULATION AND
JOINT SUBMISSION RE PROPOSED
DEPOSITION PROTOCOL**

In Case Management Order No. 10, Paragraph VI [Doc. 1319], the Court instructed the parties to file a stipulated deposition protocol by April 15, 2016. The Order also asked that the submission advise the Court of any present disputes concerning taking additional depositions of individuals who have previously be depose in the filter litigation. At present, the parties do not have any existing disputes on that topic. With regard to the deposition protocol, the parties have met and conferred regarding such a protocol, and reached agreement on a stipulation. A copy of the proposed protocol is attached as Exhibit "A".

DATED this 15th day of April 2016.

ATTORNEYS FOR PLAINTIFFS

ATTORNEYS FOR DEFENDANTS

/s/ Paul L. Stoller
 Robert W. Boatman
 Paul L. Stoller
 Gallagher & Kennedy PA
 2575 E Camelback Road, Suite 1100
 Phoenix, AZ 85016-9225

 Ramon R. Lopez (admitted pro hac vice)
 Lopez McHugh LLP
 100 Bayview Circle, Suite 5600
 Newport Beach, CA 92660

/s/ Richard B. North, Jr.
 James R. Condo
 Amanda C. Sheridan
 Snell & Wilmer
 One Arizona Center
 400 E. Van Buren
 Phoenix, AZ 85004-2202

 Richard B. North, Jr. (admitted *pro hac vice*)
 Nelson Mullins Riley & Scarborough
 LLP
 201 17th St. NW, Suite 1700
 Atlanta, GA 30363

Co-Lead/Liaison Counsel for Plaintiffs

*Attorneys for Defendants
 C. R. Bard, Inc. and Bard Peripheral
 Vascular, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Deborah Yanazzo
 Deborah Yanazzo

5376931v2/26997-0001